



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

**5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

FEB 17 2015

Susan A. Bell, Ed. D.
Superintendent of Schools
Windsor Public Schools
58 South Elm Street
Windsor Locks, Connecticut 06096-2129

Re: PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c)
and § 761.79(h)
Windsor Locks High School
Windsor Locks, Connecticut

Dear Dr. Bell:

This is in response to the Windsor Public Schools (WPS) Notification¹ for approval of a proposed plan to address PCB contamination located in the building known as Windsor Locks High School, (the Site) at 58 South Elm Street, Windsor Locks, Connecticut. The Site contains PCB-contaminated materials that exceed the allowable PCB levels under 40 CFR § 761.20(a), § 761.61, and § 761.62. Specifically, PCBs have been found in caulk, in the adjacent building substrates (i.e., brick, concrete, mortar and concrete masonry units (CMU)) and in soil.

In its Notification, WPS has proposed the following PCB remediation plan:

➤ Original 1963 Building

- Remove *PCB bulk product waste* (i.e., First floor - interior grey caulk, windows with frames and homasote board and classroom/office areas- exterior grey window/door caulk and aluminum window/door frames and fasteners) and dispose in accordance with § 761.62

¹ The Notification was prepared by Eagle Environmental, Inc., on behalf of WPS to satisfy the requirements under 40 CFR §§ 761.61(a) and (c). Information was submitted dated September 16, 2014 (PCB Action Plan-Window Replacement and Energy Conservation Project); December 23, 2014 (Response to EPA Comments and Revised Plan); January 15, 2015 (email response to EPA questions and 2nd Revised Plan); January 22 and 23, 2015 (email responses to EPA sampling questions); January 28, 2015 (email response to stairwell question); February 2, 2015 (email response to stairwell encapsulation question); and February 4, 2015 (Request for modification). These submittals shall be referred to as the "Notification".

- Remove soil in areas 1 (480 sf), 2 (650 sf), 8 (180 sf), and 11 (428 sf) to a depth of 12 inches and dispose as a *PCB remediation waste* less than (<) 50 parts per million (ppm) in accordance with 40 CFR § 761.61(a)(5)(i)(B)(2)(ii)
- Conduct verification sampling of *porous surfaces* and soil in accordance with 40 CFR Part 761 Subpart O to confirm that the < 1 ppm cleanup standard has been met

➤ 1965 Addition

- Remove caulk and glazing (i.e., interior/exterior grey door/window frame caulk and glazing, exterior sill caulk and grey window caulk at the basement stairs, interior stone sills, exterior plaster soffits at the pool and auditorium lobby) and dispose in accordance with 40 CFR § 761.62
- Remove the following *porous surfaces* and dispose in accordance with 40 CFR § 761.62: interior stone floor to a distance of 2 feet from the caulk in the auditorium lobby, all interior and exterior concrete foundations, slabs and sidewalks to a distance of 12 inches from the door caulk at the entrances to the gym and pool, interior stone window sills, and exterior plaster soffits at the pool and auditorium lobby
- Remove PCB paint on all window/door steel lintels to meet the NACE 2 cleanup standard and dispose in accordance with 40 CFR § 761.62
- Encapsulate the following *porous surfaces*:
 - Interior concrete masonry units (CMU) and the brick/brick mortar in the stairwell to a minimum distance of 8 inches from the PCB caulk at windows, at the intermediate landing and all walls in the basement and first floor to a height of 3 feet above the floor tile, and the entire wall on the southwest side of the stairwell window system
 - Interior concrete masonry units (CMU) at the window openings to a minimum distance of 8 inches from the PCB caulk
 - Interior/exterior brick/mortar to a minimum distance of 4 inches from the PCB caulk at the main entrances to the pool and auditorium lobby, and at the top and sides of window openings
- Collect wipe samples from the encapsulated surfaces to confirm that the PCB concentrations are < 1 µg/100 cm²
- Conduct verification sampling of *porous surfaces* following removal in accordance with 40 CFR Part 761 Subpart O to confirm that the < 1 ppm PCB cleanup standard has been met

WPS has determined that certain building products (i.e., 1963 construction - Cafeteria and classroom/office areas - interior/exterior glazing, exterior metal trim caulk, exterior window frame caulk (cafeteria only), and exterior grey caulk at louvers (classroom /office area only) and unit ventilator tar paper), which have PCB concentrations at < 50 ppm meet the criteria for an *Excluded PCB Product* under § 761.3. Under the PCB regulations, *Excluded PCB Products* are authorized for use and thus there is no requirement for decontamination of surfaces that are in contact with the < 50 ppm PCB products. While these building materials are not addressed in the Approval, WPS is proposing to remove the PCB products containing PCBs with greater than (>) 1 ppm but < 50 ppm and to manage these products in accordance with the Connecticut Department of Energy and Environmental Protection (CTDEEP) regulations.

Based on the EPA's review, the information provided in the Notification meets the requirements under § 761.62 and § 761.79(h) for abatement of PCB caulk and §§ 761.61(a) and (c) for decontamination and/or encapsulation of PCB-contaminated building surfaces. EPA finds that the proposed encapsulation should effectively prevent direct exposure of these PCB-contaminated surfaces to building users provided the encapsulated surfaces are maintained. EPA has determined that management in place of PCB-contaminated *porous surfaces* with encapsulation will not pose an unreasonable risk of injury to health or the environment. As such, EPA may approve the encapsulation under § 761.61(c).

WPS may proceed with its project in accordance with 40 CFR §§ 761.61(a) and (c); § 761.62; § 761.79(h); its Notification; and, this Approval, subject to the conditions of Attachment 1. Under this Approval, EPA is reserving its right to require additional investigation or mitigation measures should the results of the long-term monitoring indicate an unreasonable risk of injury to the building users.

Please be aware that this Approval requires WPS to conduct outreach activities for the school community, including students, parents, and school employees concerning the PCB remediation work. Documentation of the outreach effort shall be submitted to EPA. (Attachment 1, Approval Condition 18)

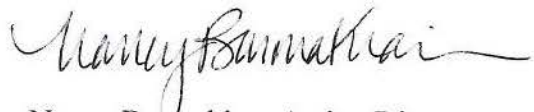
Please note that WPS will be required to record a notation on the deed for the Site as required under 40 CFR § 761.61(a)(8) since PCBs at > 1 ppm will remain on the Site.

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

EPA shall not consider this project complete until it has received all submittals required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nancy Barmakian".

Nancy Barmakian, Acting Director
Office of Site Remediation & Restoration

cc Peter Folino, Eagle Environmental, Inc.
Gary Trombly, CTDEEP
Brian Toal, DPH
File

Attachment 1 – PCB Approval Conditions

ATTACHMENT 1:

**PCB CLEANUP AND DISPOSAL APPROVAL CONDITIONS
WINDSOR LOCKS HIGH SCHOOL (the Site)
58 SOUTH ELM STREET
WINDSOR LOCKS, CONNECTICUT**

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB bulk product waste* and the *PCB remediation waste* located at the Site and identified in the Notification.
2. Windsor Public Schools (WPS) shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.
3. In the event that the cleanup plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.
4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.
5. WPS must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, WPS shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.
6. WPS is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time WPS has or receives information indicating that WPS or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.
7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by WPS are authorized to conduct the activities set forth in the Notification. WPS is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.

8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release WPS from compliance with any applicable requirements of federal, state or local law; or 3) release WPS from liability for, or otherwise resolve any violations of federal, state or local law.
9. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761 Subpart D.

NOTIFICATION AND CERTIFICATION CONDITIONS

10. This Approval may be revoked if the EPA does not receive written notification from WPS of its acceptance of the conditions of this Approval within 10 business days of receipt.
11. WPS shall submit the following information to EPA:
 - a. a certification signed by its selected abatement/demolition contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;
 - b. a contractor work plan, prepared and submitted by the selected demolition or abatement contractor(s) describing the containment and air monitoring that will be employed during abatement activities. This work plan should also include information on how and where wastes will be stored and disposed of, and on how field equipment will be decontaminated; and,
 - c. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical method requirements and quality assurance requirements specified in the Notification and in this Approval.

DECONTAMINATION AND DISPOSAL CONDITIONS

12. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.
13. All visible residues of PCB caulk and paint (i.e., *PCB bulk product waste*) shall be removed as described in the Notification.

14. The cleanup standard for *porous surfaces* in contact with *PCB bulk product waste* (i.e., brick, CMU and concrete in the 1963 section, all plaster soffits, interior stone sills, and concrete foundation, slab, and sidewalk at the entrance to the gym and pool in the 1965/1967 section) shall be less than or equal to (\leq) 1 part per million (ppm) PCBs for unrestricted use or disposal.
 - a. Sampling for *porous surfaces* shall be performed on a bulk basis (i.e., mg/kg) and reported on a dry weight analysis. Sampling for *porous surfaces* shall be conducted in accordance with the EPA Region 1 *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, May 5, 2011*, at a maximum depth interval of 0.5 inches. Verification samples shall be collected in accordance with 40 CFR 761 Subpart O.
 - b. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction/analytical method(s) is validated according to Subpart Q.
15. Following encapsulation of PCB-contaminated *porous surfaces* within the 1965/1967 section (i.e., interior concrete masonry units (CMU)/CMU mortar and interior/exterior brick at the window openings, CMU and brick/mortar in the stairwell, and interior/exterior brick/mortar at the main entrances to the pool and auditorium) with an epoxy coating, sampling shall be conducted to determine the effectiveness of the encapsulation.
 - a. Wipe sampling of encapsulated *porous surfaces* shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e. $\mu\text{g}/100\text{ cm}^2$). Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.
 - b. In the event that the PCB concentration of any wipe sample is greater than ($>$) 1 $\mu\text{g}/100\text{ cm}^2$, and if this standard cannot be achieved with the application of additional encapsulant, WPS shall contact EPA for further discussion and direction on alternatives.
 - c. WPS shall submit a long-term monitoring and maintenance plan for encapsulated surfaces as required under Attachment 1, Condition 20.
16. Initial post-abatement indoor surface sampling and indoor air sampling shall be conducted to document the effect of the abatement activities and the encapsulation.

- a. Wipe sampling of unencapsulated indoor surfaces shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e. $\mu\text{g}/100\text{ cm}^2$). Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846 and chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another method(s) is validated according to Subpart Q. The laboratory reporting limit shall be $\leq 1\text{ }\mu\text{g}/100\text{ cm}^2$.
 - b. Indoor air sampling shall be conducted in accordance with EPA Method TO-10A or EPA Method TO-4A. Sufficient sample volumes shall be collected to provide a laboratory reporting limit of $\leq 0.10\text{ }\mu\text{g}/\text{m}^3$ for total PCBs. PCB analysis shall be conducted for PCB homologues and/or PCB congeners.
 - c. In the event that PCB concentrations in the wipe samples are greater than or equal to (\geq) $1\text{ }\mu\text{g}/100\text{ cm}^2$ or air sample results are greater than ($>$) $0.45\text{ }\mu\text{g}/\text{m}^3$, WPS shall contact EPA for further discussion and direction on alternatives, which may include development of a site-specific risk exposure assessment.
17. PCB waste (at any concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with 40 CFR § 761.40; stored in a manner consistent with 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61 or § 761.62, unless otherwise specified below.
 - a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g)(6).
 - b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).
 - c. PCB-contaminated water generated during decontamination shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.60.
18. WPS shall conduct outreach activities for the school community, including students, parents, and school employees on the PCB remediation work. WPS shall submit information to EPA on its outreach activities within 30 days of receipt of this Approval.

DEED RESTRICTION AND USE CONDITIONS

19. Within thirty (30) days of completing the activities described in the Notification and in the Approval, WPS shall submit for EPA review and approval, a draft deed restriction for the Site where PCBs > 1 ppm remain. The deed restriction shall include: a description of the extent and levels of contamination at the Site following abatement; a description of the actions taken at the Site; a description of the use restrictions for the Site, if any; and, the long-term monitoring and maintenance requirements on the Site. Within seven (7) days of receipt of EPA's approval of the draft deed restriction, WPS shall record the deed restriction. A copy of this Approval shall be attached to the deed restriction.

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

20. Within 60 days of completion of the work authorized under this Approval, WPS shall submit for EPA's review and approval, a detailed monitoring and maintenance implementation plan (MMIP) for the epoxy coating and for indoor air. WPS shall incorporate any changes to the MMIP required by EPA.
- a. The MMIP shall include: a description of the activities that will be conducted, including inspection criteria, frequency, and routine maintenance activities; sampling protocols, sampling frequency, and analytical criteria; and, reporting requirements, as applicable.
 - b. The MMIP shall include a communications component which details how the maintenance and monitoring results will be communicated to the Site users, including teachers, parents, student, other on-site workers, and interested stakeholders.
 - c. The MMIP also shall include a worker training component for maintenance workers or for any person that will be conducting work that could impact the epoxy coating encapsulating the PCB-contaminated surfaces.
 - d. WPS shall submit the results of these long-term monitoring and maintenance activities to EPA. Based on its review of the results, EPA may determine that modification to the MMIP is necessary in order to monitor and/or evaluate the long-term effectiveness of the epoxy coating.
 - e. Activities required under the MMIP shall be conducted until such time that EPA determines, in writing, that such activities are no longer necessary.

21. WPS shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by WPS to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.
22. Any proposed modification(s) in the plan, specifications, or information in the Notification must be submitted to EPA no less than 14 calendar days prior to the proposed implementation of the change. Such proposed modifications will be subject to the procedures of 40 CFR § 761.61(a)(3)(ii).
23. If such modification involves a change in the use of the Site which results in exposures not considered in the Notification, the EPA may revoke, suspend, and/or modify this Approval upon finding that this risk-based cleanup and disposal action may pose an unreasonable risk of injury to health or the environment due to the change in use. EPA may take similar action if the EPA does not receive requested information needed from WPS to make a determination regarding potential risk.
24. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

RECORDKEEPING AND REPORTING CONDITIONS

25. WPS shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the cleanup and disposal and the analytical sampling shall be established and maintained by WPS in one centralized location, until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.
26. As required under Condition 20 of this Approval, WPS shall submit the results of the long-term monitoring and maintenance activities to EPA as specified in the final MMIP to be approved by EPA.

27. WPS shall submit a final report as both a hard copy and electronic version, to the EPA within 90 days of completion of the activities authorized under this Approval. At a minimum, this final report shall include: a short narrative of the project activities with photo-documentation; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of; copies of manifests and bills of lading; and copies of certificates of disposal or similar certifications issued by the disposer. The Report shall also include a copy of the recorded deed restriction and a certification signed by a WPS official verifying that the authorized activities have been implemented in accordance with this Approval and the Notification.
28. Required submittals shall be mailed to:
- Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100 - (OSRR07-2)
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527
29. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

END OF ATTACHMENT 1